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To: Members of the White Plains Common Council (Councilmembers
and Mayor)
Rod Johnson, City of White Plains Environmental Officer
Janet J. Giris, Esq., Representative of Developer 1 Water Street LLC

November 7, 2022

**Comment as to Developer's Application for Site Plan Extension
One Water Street**

Agenda Item No. 108 at November 7, 2022 Common Council Meeting

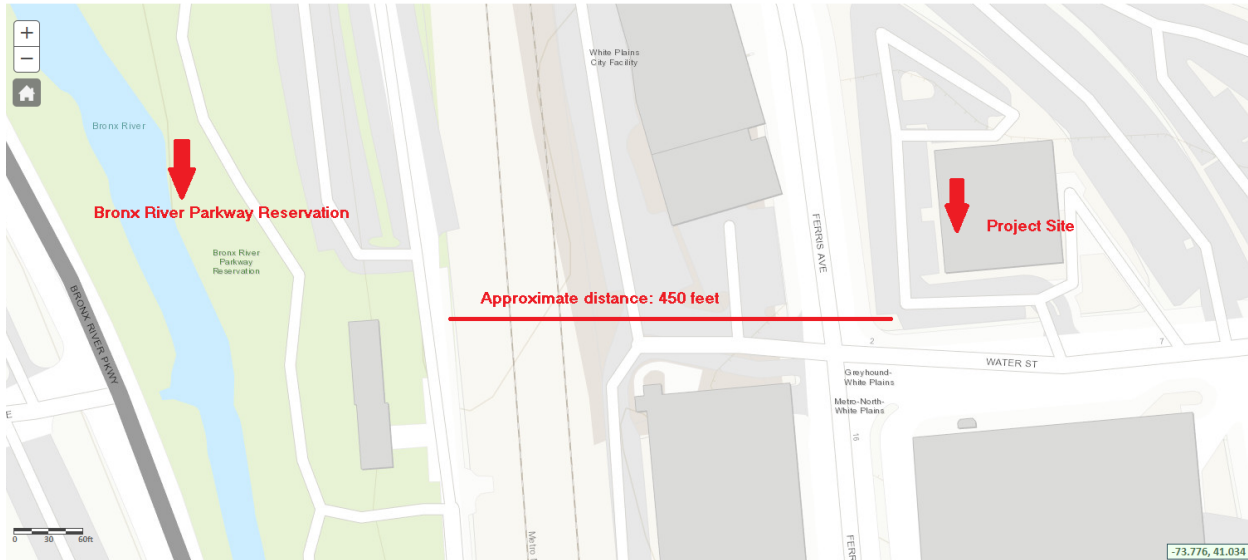
Dear Members of the Common Council:

The Developer of the proposed "One Water Street" project (located at its eponymous address) (hereinafter "One Water Street" or the "Project") has applied for extension of site-plan approval, which application is before you at tonight's meeting.

I have concerns regarding this project which are similar to the concerns I raised regarding other projects located near the Bronx River Parkway Reservation (the "Reservation") in prior correspondence to you dated October 1, 2021 and April 29, 2022.

As you are already familiar with the broad nature of those concerns, I will present my points in this letter in summary form:

- I estimate the distance between the Project and the Bronx River Parkway Reservation to be 450 feet, as shown in the below figure.



- The proposed Environmental Findings Resolution (appearing as item 118 on tonight’s agenda) does not analyze the Project’s potential impacts on the Bronx River Parkway Reservation at all, to any extent.
- The Bronx River Parkway Reservation “from jct. with Sprain Brook Rd. to and including Kensico Dam Plaza” has been listed on the National Register of Historic Places since 1991. See National Park Service, Asset Detail, <https://npgallery.nps.gov/AssetDetail/NRIS/90002143>.
- The Bronx River Corridor Study and Management Plan for Westchester County, NY - Volume 1 (July 2019) found, “Although not considered in calculating the water quality objective score, floating humanmade debris (i.e., trash) is a problem along the river and trapping this debris was identified as a stakeholder priority.”
- I have compiled photographs showing the great extent of the litter problem in and around the Bronx River at a website I maintain, <https://www.bronxriverlitter.us/>. In my observation, the amount of litter correlates with the presence of large residential developments near the Reservation. Areas near large-scale development have more litter than those in less densely developed areas.

- Two fish species which are state-listed as “High Priority Species of Greatest Conservation Need,”¹ the American Eel² and the American Shad,³ are likely present in the Reservation.
- On November 3, 2022, in the early evening an hour or two before sunset, I went running in the Bronx River Parkway Reservation. I ran on the trail from the intersection of Cemetery Road with the Reservation to the area south of Main Street in White Plains. As I have on previous visits, I noticed that, some distance south of Main Street in White Plains, where the bike/walking trail along the Bronx River is to the immediate east of and at a lower elevation than the parkway, there is a foul, chemical odor.
- While the impact of any one development like One Water Street can be significant in its own right, the combined impact of multiple developments approved by the City under similar auspices and for similar stated reasons could be truly transformative. The risks to this irreplaceable environmental and historical resource deserve more consideration.

In summary, the amount of large-scale development being approved near the Reservation is having a meaningful impact on the Reservation’s environmental quality. I continue to maintain that projects of this scale, built near the Reservation, should undergo environmental review which includes an analysis of potential impacts on the Reservation.

Thank you for your consideration of my comments on this application.

Very truly yours,



Benjamin Brown

¹ The list of “List of Endangered, Threatened and Special Concern Fish & Wildlife Species of New York State” is available at <https://www.dec.ny.gov/animals/7494.html>.

² See, e.g., Miranda, J.A., J. Waldman, and S. E. Alter. 2018. “Testing Environmental DNA Techniques to Assess American Eel Populations in the Bronx River.” Section I: 1-23 pp. In D.J. Yozzo, S.H. Fernald, and H. Andreyko (eds.), Final Reports of the Tibor T. Polgar Fellowship Program, 2015. Hudson River Foundation, available at https://www.hudsonriver.org/wp-content/uploads/library/Polgar_Miranda_TP_01_15_final.pdf.

³ Mentioned in Bronx River Corridor Study and Management Plan for Westchester County, NY - Volume I (July 2019), page 36 of 126.